

REMARKS

In the Office Action mailed August 1, 2007, claims 1-7, 9-10, 12, 15-18, 20-21 and 23 stand rejected under 35 USC 102(a) as being anticipated by U.S. Patent Publ. No. 2003/0004874 to Ludwig et al. (hereinafter “Ludwig et al.”). Claims 8, 11, 13-14, 19, 22 and 24-25 stand rejected under 35 USC 103(a) as being obvious over Ludwig et al. in view of U.S. Patent No. 6,493,685 to Ensel et al. (hereinafter “Ensel et al.”). Applicant respectfully disagrees with the Examiner’s analysis of the claims. However, in order to advance prosecution, Applicant has amended the claims to more particularly define the present invention over the cited prior art. Applicant reserves the right to file continuation application(s) directed to the subject matter of the original claims of the present application.

More particularly, amended claim 1 recites, *inter alia*,

“... **a first application component**, operably coupled to said first means, **that interacts in real-time over a network with an authenticated first-entity-class user to enter, create, maintain, and store billing information** pertaining to at least one second entity and **to create, maintain and store invoices** related to said billing information and pertaining to said at least one second entity...” (emphasis added).

Importantly, the first application component interacts in real-time over a network with an authenticated first-entity-class user to enter, create, maintain, and store billing information **as well as to create invoices related to such billing information.**

In contrast, the invoices of the Ludwig et al. system are not created on the networked system, but are created by the external biller system 12 and loaded into the database 36 by an invoice loading process 34 (manual or automatic loading) as described in paragraph 74 of Ludwig et al. This invoice loading process can be complex and difficult to maintain, and thus is advantageously avoided by the networked system of the present invention.

Ensel et al. does not remedy the shortcomings of Ludwig et al. as it fails to teach or suggest the first application component of amended claim 1. In Ensel, the billing data is loaded into the system 200 from a biller 5. It does not teach or suggest user interaction that occurs in real-time over a network in order to enter, create, maintain, and store billing information as well as to create, maintain and store related invoices as required by amended claim 1.

Because the cited prior art fails to teach or suggest important limitations of amended claim 1, Applicant respectfully asserts that amended claim 1 is patentable over the cited prior art. Similar arguments apply to independent claim 15.

The dependent claims 2-6, 8, 9, 11-14, 16, 17, 19, 20 and 22-25 are patentable over the cited prior art for those reasons advanced above with respect to independent claims 1 and 15 from which they respectively depend and for reciting additional features that are not taught or suggested by the cited prior art.

For example, claim 11 recites that “said first application component enables access to particular invoice information by at least one authenticated second-entity-class user only after posting of said particular invoice information, wherein the posting of said particular invoice information is accomplished by real-time interaction over the network with an authenticated first-entity-class user.” Nowhere does the cited prior art teach or suggest this feature. The Examiner relies on column 13, lines 28-39 of Ensel as suggesting this feature. However, this paragraph of Ensel described loading of bill data into the system 200. It does not teach or suggest user interaction that occurs in real-time over a network for posting a particular invoice as required by claim 11. For these reasons, Applicant respectfully submits that claim 11 is patentable over the cited prior art. Similar arguments apply to dependent claim 22 and new independent claim 26.

In another example, dependent claim 8 recites that “said first application component enables access to particular billing information by at least one authenticated second-entity-class user in response to finalization of said particular billing information, wherein the finalization of said particular billing information is accomplished by real-time interaction over the network with an authenticated first-entity-class user.” Nowhere does the cited prior art teach or suggest this feature. The Examiner relies on column 13, lines 28-39 of Ensel as suggesting this feature. However, this paragraph of Ensel described loading of bill data into the system 200. It does not teach or suggest user interaction that occurs in real-time over a network for finalization of particular billing information and subsequent access control as required by claim 8. For these reasons,

Applicant respectfully submits that claim 8 is patentable over the cited prior art. Similar arguments apply to dependent claim 19 and new independent claim 28.

In yet another example, claim 9 recites that “said particular billing information cannot be added to an invoice until approved by an authenticated second-entity-class user, wherein the approval of said particular billing information is accomplished by real-time interaction over the network with the authenticated second-entity-class user.” Nowhere does the cited prior art teach or suggest this feature. The Examiner relies on paragraph 130, lines 1-4 of Ludwig et al. as suggesting this feature. However, this paragraph of Ludwig et al. describes approval of an invoice, not approval of billing information that makes up the invoice as required by claim 9. For these reasons, Applicant respectfully submits that claim 9 is patentable over the cited prior art. Similar arguments apply to dependent claim 20 and new dependent claim 29.

In light of all of the above, it is submitted that the claims are in order for allowance, and prompt allowance is earnestly requested. Should any issues remain outstanding, the Examiner is invited to call the undersigned attorney of record so that the case may proceed expeditiously to allowance.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Jay P. Sbrollini". The signature is fluid and cursive, with a long horizontal stroke at the end.

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